

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:

CHAPTER 13

JANET B. PORTER

Bkcy. Case No. 16-13764-mdc

Debtor.

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**APPLICATION FOR EXPEDITED CONSIDERATION
UNDER LOCAL RULE 5070-1(F)**

The application of debtor acting through counsel respectfully represents:

1. The applicant is counsel for Movant in the above captioned matter.
2. Counsel for debtor consulted with counsel for Bank of New York Mellon in accord with subdivision (f)(1) and the parties were able to agree that it be best to hear all matters on the same date as indicated below.
3. Counsel reasons that this application has been filed in good faith in order to promote judicial economy, expediency with respect to all matters concerning the above debtor pending before the Court. Moreover, there is a chance that debtor would be divested of property of the bankruptcy estate without first presenting your honor with this information. The applicant asks that this motion be heard along with a related Motion already scheduled for hearing in front of the Honorable Judge Coleman on December 14, 2016 at 1:00pm or as soon as possible in order to allow debtor to narrow the issues and arguments contemplated before the Court..
4. Reduction of the time period in question is not prohibited under LOCAL RULE 5070-1(F).

WHEREFORE, applicant requests entry of the order submitted herewith.

Roach, Leite & Manyin, LLC

Date: December 5, 2016

/s/ Robert Leite-Young
Robert Leite-Young, Esquire
Attorney debtor
6950 Castor Avenue
Philadelphia, PA 19149

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ORDER SETTING EXPEDITED HEARING TO CONSIDER MOTION

AND NOW, this _____ day of _____, 20____, the Movants having requested expedited consideration of her Motion to Reopen and Reinstate case, IT IS HEREBY ORDERED that an expedited hearing for my consideration of the Movant's Motion shall be held at:

**United States Bankruptcy Court - E.D. PA.
Courtroom Number 2
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street**

Philadelphia, Pennsylvania on _____, 20____, at __:__ .m. prevailing time.

IT IS HEREBY FURTHER ORDERED that any party opposing the Motion shall file an answer or response at or before the time and date of the hearing set above and that any party opposing the Motion shall appear at the hearing on the Motion or it may be granted without further notice.

IT IS HEREBY FURTHER ORDERED that Movants' counsel shall immediately both (1.) notify by telephone and (2.) serve copies of this signed Order and the Motion on the following parties by e-mail or facsimile: Counsel for the United States Trustee and either the Chapter 7 or the Chapter 13 Trustee, counsel for the Debtors [if the motion is not filed by the Debtors], all secured creditors with liens on Movants' property (by serving their counsel if known), all other parties affected by the Motion (by serving their counsel if known), and all other interested parties.

BY THE COURT

MAGDELINE D. COLEMAN
United States Bankruptcy Judge